

Billing Records for Leon et al v. Anderson's Tree Service Inc. et al - 2:23-cv-09525-JMA-JMW					
Date	Attorney	Time Spent (Hours)	Notes	Paralegal	
12/11/2023	RA	1.4	Intake of Plaintiff (EL)		P
12/14/2023	RA	0.2	Call to client		P
12/15/2023	RA	1.2	Research on corp./individual def, call to client		
12/15/2023	RA	1.4	Intake of Plaintiff (GD)		P
12/18/2023	RA	3.3	Drafting Complaint, calls to clients re: info on claims, defs, active corps., perform calculations/damages analysis		P
12/27/2023	RA	0.3	Calls to clients		P
12/28/2023	RA/JO	2.3	Meeting w/ clients; edit/finalize complaint, file complaint/summons/cover sheet, NOA		
1/3/2024	RA	0.2	Request for Service of Process		
1/18/2024	RA	0.5	Reviewed Defs Answer, note defenses		
2/2/2024	RA	0.3	Update to clients		P
2/19/2024	RA	1.2	Reviewed Defs Initial Disclosures and Witness Affidavits		
2/20/2024	RA	0.7	Meeting w/ clients re: disclosures/affidavits		P
2/21/2024	RA	1	Drafted and emailed Plaintiffs' Initial Disclosures to Defs counsel		
2/21/2024	AS	0.5	Review file, docs, attend Initial Conference, saved notes of conference		
2/21/2024	RA	2.8	Intake of 2 Opt-in Plaintiffs (JL & ES)		P
2/27/2024	RA	0.3	Calls to clients		P
3/19/2024	RA	1.2	Drafted and emailed Plaintiffs' Responses to FLSA Order to Defs counsel, calls to clients		P
3/21/2024	RA	1	Revised Plaintiffs' Damages Calculations		
3/22/2024	RA	0.5	Reviewed Defs Response to FLSA Order		
4/8/2024	RA	2.4	Meet w/ clients, drafted Plaintiffs' Response to Court Interrogatories		P
4/9/2024	RA	0.3	Finalized and emailed Plaintiffs' Response to Court Interrogatories to Defs counsel		
4/17/2024	KS	0.8	Call w/ defs atty, received defs records, drafted joint status letter		
5/6/2024	KS	0.2	Filed joint status letter, NOA filed		
5/21/2024	KS	0.3	Emails w/ mediator and defs atty		
7/1/2024	RA	0.3	Calls to clients		P
7/3/2024	KS	0.5	Email w/ defs atty, drafted and filed joint status letter		
7/11/2025	RA	0.2	Calls to clients		P
7/15/2025	RA	1.5	Conduct assets research on defs via LexisNexis, Google, ACRIS, etc.		
7/16/2024	RA	1.8	Drafted and emailed mediation statement and damages calculations to mediator		
7/17/2024	RA	2.6	Pre-mediation meeting with clients, attend mediation, post-mediation meeting w/ clients; enter notes		P
7/18/2024	RA	0.2	Calls to clients		P
7/26/2024	JO	0.5	Drafted and filed Joint Status Report, email w/ defs atty		
8/2/2024	RA	0.3	Filed Consent to Join for 2 Plaintiffs		
9/13/2024	RA	1.8	Drafted and emailed Plaintiffs' First Set of Discovery Demands to Defs counsel		
9/16/2024	RA	0.7	Review Defs Discovery Demands; note issues/objections		
9/18/2024	RA	0.3	Update to clients		P
10/21/2024	KS	2.6	Review Defs Discovery Responses, records, drafted Deficiency Letter, calls to clients		
10/22/2024	RA	2.8	Drafted Responses to Defs Discovery Demands		
10/28/2024	RA	0.2	Call to clients		P
11/1/2024	RA	0.2	Call to clients		P
11/13/2024	KS	3.3	Meet w/ clients to review Discovery Responses, finalized/edit, emailed to Defs atty		P
1/14/2025	KS	2.3	Finalized/emailed Plaintiffs' Deficiency Letter, drafted & emailed Responses to Defs Deficiency Letter, calls to clients		P
1/28/2025	KS	0.2	Email w/ defs atty		
2/18/2025	RA	0.2	Follow-up email to defs atty		
2/27/2025	RA	0.5	Review Defs Responses to Deficiency Letter, calls to clients		
3/6/2025	RA	1.2	Drafted Responses to Defs 2nd Deficiency Letter, calls to clients		P
3/7/2025	KS	0.3	Finalized/emailed Plaintiffs' Responses to Defs 2nd Deficiency Letter, calls to clients		P
3/10/2025	KS	0.5	Status Conference, saved notes of conference		

3/24/2025	JO	3.3	Review file, prepare outline, conduct depositions of both defendants	
3/26/2025	RA	0.3	Update to clients	P
3/31/2025	ZT	4.2	Pre-deposition meeting with client; defend Plaintiff deposition	
3/31/2025	RA	2.2	Pre-deposition meeting with client; defend Plaintiff deposition	
4/21/2025	RA	2.7	Drafted and filed letter in opposition to defs motion for sanction and cross moved for sanction	
5/20/2025	RA	0.3	Emails w/ defs atty, calls to clients	P
5/29/2025	ZT	5	Pre-mediation meeting with Plaintiffs; Plaintiffs' Depositions, saved notes of depositions	
6/6/2025	KS	3.6	Pre-mediation meeting with Plaintiff; Plaintiff's Deposition; saved notes of depositions	
7/1/2025	KS	2.2	Drafted and filed JPTO, emails w/ defs atty	
8/13/2025	RA	1.5	Drafted and emailed Plaintiff's confidential settlement statement and damages calculations, to Chambers	
8/19/2025	RA	0.3	Calls to clients	P
8/20/2025	RA	2.5	Review file; calls with clients; attend Settlement Conference, saved notes of conference	P
8/27/2025	JO	2.7	Calculate settlement breakdown, drafted and emailed Settlement Agreement and COJ to defs atty	
9/9/2025	JO	0.3	Receive edits, finalize settlement agreement	
9/10/2025	RA	0.5	Meet with client; review, translate agreement, obtain signatures	P
9/11/2025	RA	0.4	Meet with client; review, translate agreement, obtain signatures	P
9/11/2025	JO	2.3	Drafted Motion for Settlement Approval, emailed to defs atty	
9/12/2025	JO	0.9	Meet with clients; review, translate agreement, obtain signatures	P
9/15/2025	JO	0.2	Emailed signed Agreement to defs atty	
9/17/2025	JO	0.8	Prepare and finalize all settlement documents for filing; file on ECF	

<u>Total Hours</u>				
RA	48	* \$500.00 = \$		\$ 24,000.00
JO	13.3	* \$400.00 = \$		\$ 5,320.00
KS	16.8	* \$250.00 = \$		\$ 4,200.00
ZT	9.2	* \$175.00 = \$		\$ 1,610.00
Paralegal	30.6	* \$100.00 = \$		\$ 3,060.00
	<b>Total: \$</b>			<b>38,190.00</b>

<u>Expenses Incurred</u>		
Date	Cost	Note
12/23/2023	\$405.00	EDNY Filing Fee
2/14/2024	\$524.00	Cost of Attempted Service and Service of Process on All Defendants
7/14/2024	\$300.00	Cost of Mediation
4/3/2025	\$625.50	Cost of Court Reporting
	<b>\$1,854.50</b>	

## **Attorney Qualifications and Lodestar Calculation for Plaintiffs' Counsel**

### **i. Attorney Roman Avshalumov**

Roman Avshalumov has been an attorney for over fifteen years, and is admitted to practice in New York and New Jersey, as well as the EDNY, SDNY, and District of New Jersey. He has represented both plaintiffs and defendants in labor law actions. Mr. Avshalumov has tried numerous labor/employment cases and has settled over a hundred more. He has also tried over 50 personal injury and employment actions. Mr. Avshalumov is the senior managing attorney at Helen F. Dalton & Associates, P.C., where he oversees all litigation at the firm, and has done so for over a decade. Mr. Avshalumov currently bills at **\$500.00** per hour, which is standard for attorneys with his level of experience. Throughout this case, Mr. Avshalumov spent approximately **48.0 hours** on this case. Accordingly, Mr. Avshalumov reasonably would charge **\$24,000.00** for his work performed in this matter.

### **ii. Attorney James O'Donnell**

James O'Donnell has been an attorney for ten years and is admitted to practice in New York as well as the EDNY and SDNY. Mr. O'Donnell is the head of the labor law practice group and managing attorney at Helen F. Dalton & Associates, P.C. and oversees all labor and employment matters and litigation at the firm. Mr. O'Donnell has exclusively worked on employment matters during his nine years at the firm. He has appeared on hundreds of FLSA matters in the Second Circuit, including collective actions and class actions, and has settled or otherwise resolved over five hundred employment discrimination and wage-and-hour cases in New York state and federal courts during his employment. Mr. O'Donnell currently bills at **\$400.00** per hour, which is standard for attorneys with his level of experience. Throughout this case, Mr. O'Donnell spent approximately **13.3 hours** on this case. Accordingly, Mr. O'Donnell reasonably would charge **\$5,320.00** for his work performed in this matter.

### **iii. Attorney Katelyn Schillaci**

Ms. Schillaci is a junior associate and second-year attorney at Helen F. Dalton & Associates, P.C. who specializes in employment matters, including wage-and-hour and discrimination matters. Ms. Schillaci is admitted to practice in New York as well as EDNY and SDNY. Currently, Ms. Schillaci bills at a rate at **\$250.00** per hour, which is standard for attorneys with her level of experience. Ms. Schillaci spent **16.8 hours** on the case and therefore billed **\$4,200.00** for work performed in this matter.

### **iv. Attorney Zubair Tahir**

Zubair Tahir was a junior associate at Helen F. Dalton & Associates, P.C. who practiced labor/employment law specializing in wage-and-hour and discrimination matters as well as personal injury. Mr. Tahir bills at a rate of **\$175.00** per hour, which is standard for attorneys with his level of experience. Throughout this case, Mr. Tahir spent **9.2 hours** on the case and therefore billed **\$1,610.00** for the work performed in this matter. *Note: Attorney Tahir no longer works at our office as of July 2025.*

**v. Paralegal Services**

Lastly, Plaintiffs' counsel incurred approximately **30.6 hours** of paralegal services provided at **\$100.00** per hour, for approximately **\$3,060.00** in total.

**vi. Lodestar Calculation**

As such, Plaintiff's counsel has incurred approximately **\$38,190.00** in attorneys' fees using the Lodestar Method, not including expenses associated with matter.

**vii. Basis for Requested Hourly Rates**

On January 21, 2025, Senior District Judge Frederic Block held, "Adjusted for inflation and market conditions, I have rounded out the forum rates in the Eastern District to now be \$450-\$650 for partners, \$300-\$450 for senior associates, \$150-\$300 for junior associates, and \$100-\$150 for paralegals. Moreover, some stability is sensible in order to avoid having to establish new rates every year; accordingly, barring major inflationary deviations, I would not revisit them for five years." *Rubin v. HSBC Bank USA*, 20-cv-04566 (E.D.N.Y. 2025).